

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' THIRTY-EIGHTH (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the thirty-eighth omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (JTD)
Thirty-Eighth Omnibus Claims Objection
Schedule 1 - Superseded Claims

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
50445	Name on file	FTX Trading Ltd.			89904	Name on file	FTX Trading Ltd.		
			1INCH-PERP	0.000000000000000				1INCH-PERP	0.000000000000000
			AAVE-PERP	0.0000000000000113				AAVE-PERP	0.0000000000000113
			ADA-PERP	0.000000000000000				ADA-PERP	0.000000000000000
			ALGO-PERP	0.000000000000000				ALGO-PERP	0.000000000000000
			APT-PERP	0.000000000000000				APT-PERP	0.000000000000000
			ATOM-PERP	0.000000000000000				ATOM-PERP	0.000000000000000
			AVAX-PERP	0.000000000000000				AVAX-PERP	0.000000000000000
			AXS-PERP	-2,000.000000000000000				AXS-PERP	-2,000.000000000000000
			BAL-20200925	0.000000000000000				BAL-20200925	0.000000000000000
			BCH-PERP	0.000000000000000				BCH-PERP	0.000000000000000
			BOBA	0.029600000000000				BOBA	0.029600000000000
			BSV-PERP	0.000000000000000				BSV-PERP	0.000000000000000
			BTC-20200925	0.000000000000000				BTC-20200925	0.000000000000000
			BTC-PERP	-0.000000000000035				BTC-PERP	-0.000000000000035
			COMP-20200626	0.000000000000000				COMP-20200626	0.000000000000000
			COMP-20200925	0.000000000000000				COMP-20200925	0.000000000000000
			COMP-PERP	0.000000000000000				COMP-PERP	0.000000000000000
			CREAM-PERP	0.0000000000000454				CREAM-PERP	0.0000000000000454
			DEFI-20200925	0.000000000000000				DEFI-20200925	0.000000000000000
			DEFI-PERP	0.000000000000000				DEFI-PERP	0.000000000000000
			DOGE-PERP	0.000000000000000				DOGE-PERP	0.000000000000000
			DOT-PERP	-11,000.000000000000000				DOT-PERP	-11,000.000000000000000
			DYDX-PERP	-0.0000000000000454				DYDX-PERP	-0.0000000000000454
			EOS-PERP	0.000000000000000				EOS-PERP	0.000000000000000
			ETC-PERP	0.000000000000000				ETC-PERP	0.000000000000000
			ETH-PERP	0.000000000000000				ETH-PERP	0.000000000000000
			ETHW	0.000237840000000				ETHW	0.000237840000000
			FTT	1,000.000100000000000				FTT	1,000.000100000000000
			FTT-PERP	-2,000.000000000000000				FTT-PERP	-2,000.000000000000000
			GMT-PERP	0.000000000000000				GMT-PERP	0.000000000000000
			HT-PERP	-0.0000000000004206				HT-PERP	-0.0000000000004206
			KNC-PERP	0.000000000000000				KNC-PERP	0.000000000000000
			LEND-PERP	0.000000000000000				LEND-PERP	0.000000000000000
			LINK-PERP	0.000000000000000				LINK-PERP	0.000000000000000
			MATIC-PERP	0.000000000000000				MATIC-PERP	0.000000000000000
			MTA-PERP	0.000000000000000				MTA-PERP	0.000000000000000
			OMG	0.129600000000000				OMG	0.129600000000000
			OMG-20211231	0.000000000000000				OMG-20211231	0.000000000000000
			OP-PERP	0.000000000000000				OP-PERP	0.000000000000000
			PEOPLE-PERP	0.000000000000000				PEOPLE-PERP	0.000000000000000
			POLIS	0.007200000000000				POLIS	0.007200000000000
			RUNE-PERP	-0.0000000000010913				RUNE-PERP	-0.0000000000010913
			SAND-PERP	0.000000000000000				SAND-PERP	0.000000000000000
			SKL-PERP	0.000000000000000				SKL-PERP	0.000000000000000
			SOL-PERP	0.000000000000000				SOL-PERP	0.000000000000000
			SRM	41.888428200000000				SRM	41.888428200000000
			SRM_LOCKED	330.831571800000000				SRM_LOCKED	330.831571800000000
			SUSHI-PERP	0.000000000000000				SUSHI-PERP	0.000000000000000
			THETA-PERP	0.000000000000000				THETA-PERP	0.000000000000000
			TRX-PERP	0.000000000000000				TRX-PERP	0.000000000000000
			UNI-PERP	0.000000000000000				UNI-PERP	0.000000000000000
			USD	4,513,170.506996885000000				USD	4,513,170.506996885000000
			WAVES-PERP	0.000000000000000				WAVES-PERP	0.000000000000000
			XRP-PERP	0.000000000000000				XRP-PERP	0.000000000000000
			XTZ-PERP	0.000000000000000				XTZ-PERP	0.000000000000000
			YFI-PERP	0.000000000000000				YFI-PERP	0.000000000000000
			ZIL-PERP	0.000000000000000				ZIL-PERP	0.000000000000000
29744	Name on file	FTX Trading Ltd.			66291*	Name on file	FTX Trading Ltd.		
			BNB	8,487.905793900000000				1INCH	0.168315850000000
			ETH	31.008091270000000				ALEPH	0.426870000000000
			USD	14,774,936.870000000000000				ATOM-PERP	0.000000000000000
			USD	4.060000000000000				AVAX-PERP	0.000000000000000

*Surviving Claim included as the claim to be modified subject to the Debtors' Forty-Second (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
1158	Name on file	FTX Trading Ltd.	USD	\$49,108,825.68	85314	Name on file	FTX Trading Ltd.	BAL-20201225	0.000000000000000
								BAL-20210326	0.000000000000000
								BAT	0.416480000000000
								BIDEN	0.000000000000000
								BNB	8,487.905793900000000
								BNB-20200925	0.000000000000000
								BNB-PERP	0.000000000000000
								BNT	0.009117000000000
								BTC	0.000125439536663
								BTC-20201225	0.000000000000000
								BTC-20210625	-0.000000000000003
								BTC-PERP	-0.000000000000014
								COMP	0.000065273000000
								COPE	0.055005000000000
								DEFI-PERP	0.000000000000000
								DOGE	0.727825000000000
								ETH	31.008091275000000
								ETH-20210625	-0.000000000000113
								ETH-PERP	0.000000000000000
								ETHW	31.008541900000000
								FTT	150.024916155531000
								LEO-PERP	0.000000000000000
								LINK-20200925	0.000000000000000
								MTA-PERP	0.000000000000000
								OXY	0.067460000000000
								PERP	0.000000010000000
								RAY	0.653665000000000
								RAY-PERP	0.000000000000000
								ROOK	0.000984367500000
								ROOK-PERP	0.000000000000000
								RUNE	0.021244000000000
								RUNE-20201225	0.000000000000000
								RUNE-PERP	0.000000000000000
								SNX-PERP	0.000000000000000
								SOL	0.015956639351818
								SOL-20210326	0.000000000000000
								SOL-PERP	0.000000000000000
								SRM	1,516.391089950000000
								SRM_LOCKED	11,483.656521040000000
								SUSHI-20200925	0.000000000000000
								SUSHI-20210326	0.000000000000000
								SUSHI-PERP	0.000000000000000
								TRUMP	0.000000000000000
								UNI-20200925	0.000000000000000
								USD	14,774,936.870041200000000
								USDT	4.057985052641700
								WAVES-PERP	0.000000000000000
								YFI	0.000000000000000
								YFI-PERP	0.000000000000003
1158	Name on file	FTX Trading Ltd.	USD	\$49,108,825.68	85314	Name on file	FTX Trading Ltd.		Undetermined*

*Indicates claim contains unliquidated and/or undetermined amounts

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
1599	Name on file	FTX Trading Ltd.			85316	Name on file	FTX Trading Ltd.		
		USD		\$19,770,211.88					Undetermined*